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CALIFORNIA BUILDING
STANDARDS COMMISSION

October 16, 2018

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833-2936

RE: Support for OSFM Proposed changes CRC-Item 4, CBC-Item 17 & CCR: Flammability Standards for Building Insulation Materials

Dear Members of the California Building Standards Commission:

We are writing to express our strong support for the California State Fire Marshal's proposal "Flammability Standards for Building Insulation Materials" which would change the California Building Code, California Residential Code, and California Code of Regulations to allow the use of polystyrene building insulation without added flame retardants for use in below-grade applications.

As a real estate development and property management company, we practice green building and design whenever possible. Many of our tenants request products with the best environmental footprint, which includes materials without hazardous chemicals. If California were to update its building codes in line with the State Fire Marshal's proposal, we could better meet the growing market demand of our tenants seeking safer materials. We would welcome this change to the code, as it would allow us to use less toxic materials in below-grade applications while still maintaining fire safety.

We have read the study released by the California State Fire Marshal finding that the fire safety performance of below-grade polystyrene insulation is comparable whether or not flame retardants are present. This means that the addition of these harmful chemicals to below-grade insulation materials does not make worksites or buildings significantly safer from fire.

Therefore, flame retardant-free insulation does not represent an added fire safety risk. Because this proposal contains requirements for clear, prominent, and unambiguous labelling, our crews can easily distinguish this material from other insulation, and install it only in the allowed locations.

Our workers have the potential to be exposed to chemicals from these materials throughout the construction process: during storage, installation, and demolition. Chemical exposure is both an occupational health risk and a potential economic liability. Of course, we take every precaution to keep our crews safe. But allowing insulation without these hazardous chemicals on the jobsite seems like a win-win situation because it will reduce the risk of exposure for our workers without adding an additional fire safety risk.

We are optimistic this change would eventually lead to lower costs for insulation, as it costs money to add flame retardants to insulation. Once manufacturers are no longer required to add these chemicals, and production of flame retardant-free insulation increases, the price for that insulation will lower. It's ideal if we can both reduce costs and potential health concerns.

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This code change proposal was crafted after a rigorous scientific process, and will maintain jobsite safety for all workers. Therefore, we urge the California Building Standards Commission to approve the OSFM's proposed changes to Flammability Standards in Building Insulation Materials.

Regards,



Richard K. Robbins
Wareham Development

CC: Chief Dennis Mathisen, Office of the State Fire Marshal